

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 3:17-cr-149-DPJ-FKB-1

KEVIN LAWRENCE

DEFENDANT

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW Kevin Lawrence, Defendant, by and through the undersigned counsel, and files this unopposed motion for continuance in the above styled and referenced cause and as grounds in support of same would respectfully state unto this Honorable Court the following to-wit:

1. On March 7, 2018, an order was entered setting the pretrial conference in this matter on April 5, 2018, and the trial on April 23, 2018.
2. On March 30, 2018, an order substituting counsel was entered indicating that the undersigned is substituting the Federal Public Defender's Office as counsel for Defendant.
3. The charges and potential defenses in this matter are complex in fact and law.
4. Undersigned has not had adequate time to conduct and review discovery, investigate, and prepare for a defense.
5. In order to have adequate time, a continuance of the pretrial and trial to the next terms of court is necessary.
6. Further, undersigned is a municipal court judge in Madison County and serves on the first and third Thursday of every month. Therefore, the undersigned requests that the pretrial and trial not be set on those days.
7. The undersigned has spoken with counsel for the Government, Assistant United

States Attorney Chris Wansley, and the Government has no objection to this request.

8. After being fully advised of his rights pursuant to the Speedy Trial Act, Defendant hereby agrees to this request and specifically waives the time period covered by this continuance, if granted, and further states that this request is not for delay, but, is in the interests of justice and fairness.

WHEREFORE PREMISES CONSIDERED, Defendant, Kevin Lawrence, by and through undersigned counsel respectfully requests that the unopposed motion for continuance be received and considered by this Honorable Court and after same an Order issued granting a continuance of the previously set pretrial and trial date to the next term of court. Further, the undersigned requests that the new dates not be set on the first and third Thursday of every month.

This the 4th day of April, 2018.

Respectfully submitted,

/s/John R. Reeves

John R. Reeves, MSB# 4699
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601-355-9600
Attorney for Defendant

CERTIFICATE OF SERVICE

I, John R. Reeves, do hereby certify that I have on this date filed the foregoing with the clerk and have served a true and correct copy of the same via the court's electronic filing system on all parties record.

This the 4th day of April, 2018.

Respectfully submitted,

/s/John R. Reeves